

The Honorable James L. Robart

FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

DOROTHY TRUEBLOOD,

Plaintiff,

v.

VALLEY CITIES COUNSELING AND
CONSULTATION,

Defendant.

CASE NO. 23-2-CV-00269 JLR

STIPULATED MOTION AND
~~[PROPOSED]~~ ORDER TO EXTEND
DEADLINE FOR FILING OF MOTION
FOR SUMMARY JUDGMENT AND
STRIKE TRIAL DATES

I. STIPULATED MOTION

The parties, by and through their undersigned counsel of record, hereby stipulate to and jointly request pursuant to LCR 4(d) to strike the trial date in the above captioned matter and for an extension of the dispositive motion deadlines set forth in the Order Setting Civil Case Schedule. The operative deadline to file a dispositive motion is April 30, 2024. The parties have conferred and each is intending to file a dispositive motion. The parties will stipulate to the material facts, and intend to stipulate to issues. No party has previously requested an extension of the trial date or pre-trial deadlines. Specifically, the parties request that the Court set the following deadline for filing dispositive motion(s):

June 30, 2024.

STIPULATED MOTION TO EXTEND DISPOSITIVE
MOTION DEADLINE AND VACATE TRIAL DATE

- 1

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1 The parties have worked together regarding discovery and all discovery has been
2 completed by the required date of April 1, 2024. However, the depositions were taken the end
3 of March and the extension of time to file the Rule 56(c) Summary Judgment Motions will
4 allow the parties additional time to receive and review the transcripts, determine material facts
5 and issues, and submit the briefing.

6 The parties desire to resolve this case by dispositive motion practice, and do not intend
7 to move forward to trial.

8
9 Good cause exists for this extension. Due to various scheduling conflicts, the parties
10 have agreed to the above-mentioned deadline, and striking of further trial-dates. This agreed
11 upon extension will provide the parties with sufficient time to review discovery and submit
12 their motions. The parties respectfully request that the Court grant this stipulated motion.

13 DATED this 2nd day of April, 2024.

14 Jointly submitted by:

15 PACIFIC JUSTICE INSTITUTE:

16
17 By: s/ Tracy Tribbett

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25 By s/ Laura T. Morse

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STIPULATED MOTION TO EXTEND
DISPOSITIVE MOTION DEADLINE AND
VACATE TRIAL DATE - 2

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II. ORDER

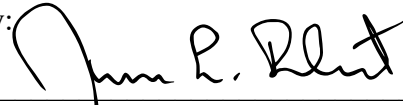
Based on the stipulation of counsel for the parties,

IT IS HEREBY ORDERED that the trial date and all other dates in the Minute Order Setting Trial Deadlines and Related Dates be stricken and that the deadline for filing of dispositive motion(s) under Rule 56(c) be moved to **June 28, 2024**.*

*Because the parties' proposed date of June 30, 2024 falls on a Sunday, the court sets the dispositive motions deadline for Friday, June 28, 2024.

DATED this 2nd day of April, 2024.

By:



Honorable Judge James L. Robart

Presented by:

By: s/ Tracy Tribbett

Tracy Tribbett, WSBA #35922

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